



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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Hon. Sylvia O. Hinds-Radix  
*Corporation Counsel*

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September 26, 2023

**BY ECF**

Honorable Arun Subramanian  
United States District Court  
Southern District of New York  
New York, New York 10007

Re: Taveras v. New York City, 20 CV 01200 (AS)

Dear Judge Subramanian:

I am an attorney in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and counsel for Defendant in the above-referenced action. I write in accordance with section 3(E) of Your Honor's Individual Practices to request an extension of time for Defendant to cross-move for summary judgment and submit opposition to Plaintiff's motion for summary judgment. Defendant's cross-motion and opposition papers are currently due on September 29, 2023.

The extension is requested due to pending deadlines in other matters that I am handling as well as a trial in a matter I am handling that is now scheduled to start November 15, 2023, the day before Defendant's reply on its cross-motion in this action is currently due. This is the first request for such an extension and Plaintiff's counsel kindly consents. A three-week extension would result in the following briefing schedule: Defendant's cross-motion for summary judgment and opposition to the plaintiff's motion for summary judgment would be due on October 20, 2023; Plaintiff's opposition to the cross-motion and reply in further support of his motion would be due on November 10, 2023; and Defendant's reply in further support of its cross-motion would be due December 7, 2023.

Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Kerri A. Devine